

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY, SYLVIA  
DAY, JONATHAN FRANZEN, JOHN  
GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA ROBINSON,  
GEORGE SAUNDERS, SCOTT TUROW, and  
RACHEL VAIL, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI  
GP LLC, OPENAI, LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION LLC, OPENAI  
HOLDINGS LLC, OPENAI STARTUP FUND I  
LP, OPENAI STARTUP FUND GP I LLC,  
OPENAI STARTUP FUND MANAGEMENT  
LLC, and MICROSOFT CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE LINDEN,  
DANIEL OKRENT, JULIAN SANCTON,  
HAMPTON SIDES, STACY SCHIFF, JAMES  
SHAPIRO, JIA TOLENTINO, and SIMON  
WINCHESTER, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI  
GP LLC, OPENAI, LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION LLC, OPENAI  
HOLDINGS LLC, OPENAI STARTUP FUND I  
LP, OPENAI STARTUP FUND GP I LLC,  
OPENAI STARTUP FUND MANAGEMENT  
LLC, and MICROSOFT CORPORATION,

Defendants.

Civil Action No. 1:23-cv-08292 (SHS);  
No. 1:23-cv-10211 (SHS);  
No. 1:24-cv-00084 (SHS)

**NOTICE OF MOTION AND  
MOTION FOR ADMISSION  
*PRO HAC VICE***

NICHOLAS A. BASBANES and NICHOLAS  
NGAGOYEANES (professionally known as  
Nicholas Gage), individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI GP, L.L.C., OPENAI  
HOLDINGS, LLC, OAI CORPORATION,  
LLC, OPENAI GLOBAL, LLC, OPENAI,  
L.L.C., and OPENAI OPCO, LLC,

Defendants.

PURSUANT TO Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Jared B. Briant, hereby moves this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendant Microsoft Corporation in the above-captioned actions. I am in good standing of the bar of the State of Colorado and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

**FAEGRE DRINKER BIDDLE & REATH LLP**

Dated: Denver, Colorado  
February 27, 2024

By: /s/ Jared B. Briant

Jared B. Briant

1144 15th Street, Suite 3400  
Denver, Colorado 80202  
(303) 607-3588  
jared.briant@faegredrinker.com

*Attorneys for Microsoft Corporation*